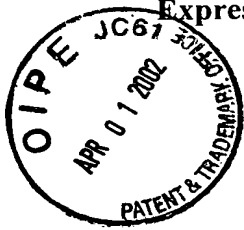


Express Mail No.: EL 752243347 US



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4-1602
PATENT
60709-00012

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Barton et al.

Serial No.: 09/848,051

Filed: May 3, 2001

For: METHODS AND SYSTEMS FOR
COMPLIANCE PROGRAM
ASSESSMENT

:
: Art Unit: 2152

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: Examiner:
:
:
:

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APR 04 2002
Technology Center 2100

REQUEST FOR APPROVAL OF DRAWING CHANGES

Commissioner for Patents
Washington, D.C. 20231

Applicants respectfully request approval of the following drawing changes. Figures 4, 12, 13, 17, and 20 were expanded into multiple drawing sheets to meet font size requirements. Specifically, originally filed Figure 4 is now illustrated in Figures 4A and 4B; originally filed Figure 12 is now illustrated in Figures 12A and 12B; originally filed Figure 13 is now illustrated in Figures 13A and 13B; originally filed Figure 17 is now illustrated in Figures 17A, 17B, 17C, and 17D; and originally filed Figure 20 is now illustrated in Figures 20A and 20B.

Additionally, Applicants hereby submit a substitute drawing sheet for Figure 1 for examination in the above-referenced application. Submitted herewith is the drawing of record showing the proposed change in red permanent ink for approval by the Examiner. Specifically, reference label "20" on the "Database" has been replaced with reference label "18." Applicants respectfully requests approval of the indicated drawing changes as described in specification at pate 7, paragraph 49.

Express Mail No.: EL 752243347 US

PATENT
60709-00012

In anticipation of the approval of the drawing changes, Applicants are submitting formal drawings incorporating the above-noted change. No new matter has been added. Favorable action is respectfully solicited.

Respectfully submitted,



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ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070

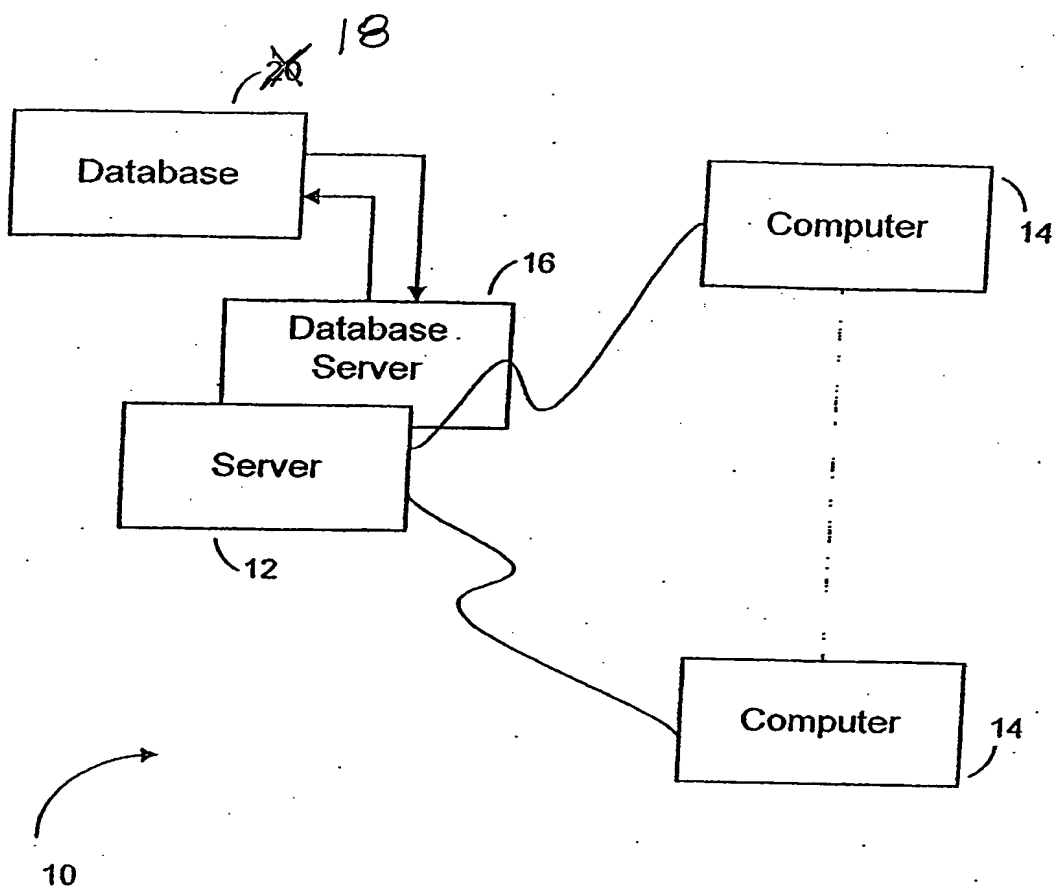


FIG. 1

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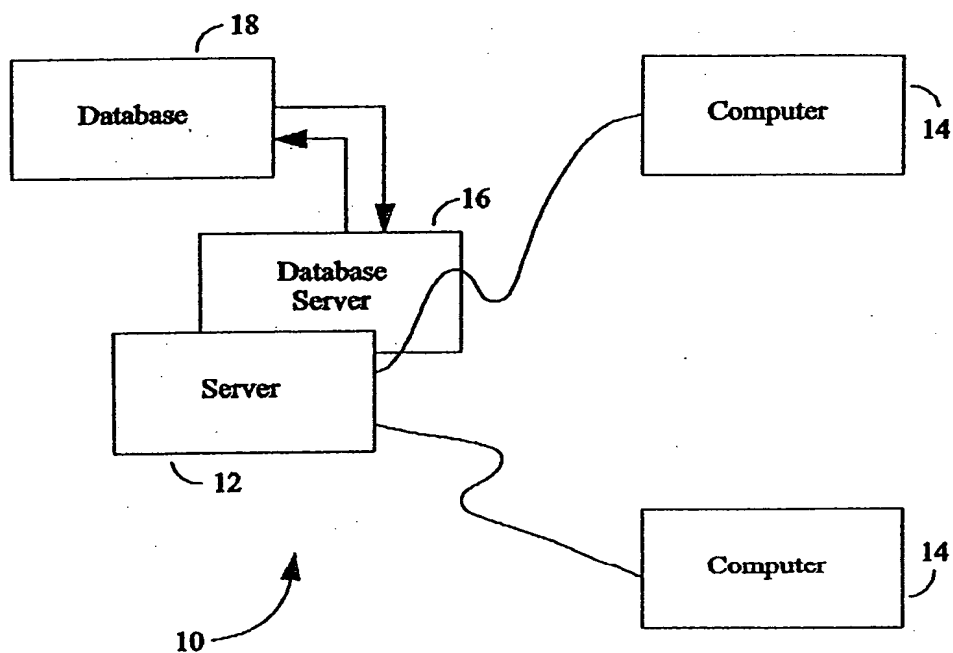


FIG. 1

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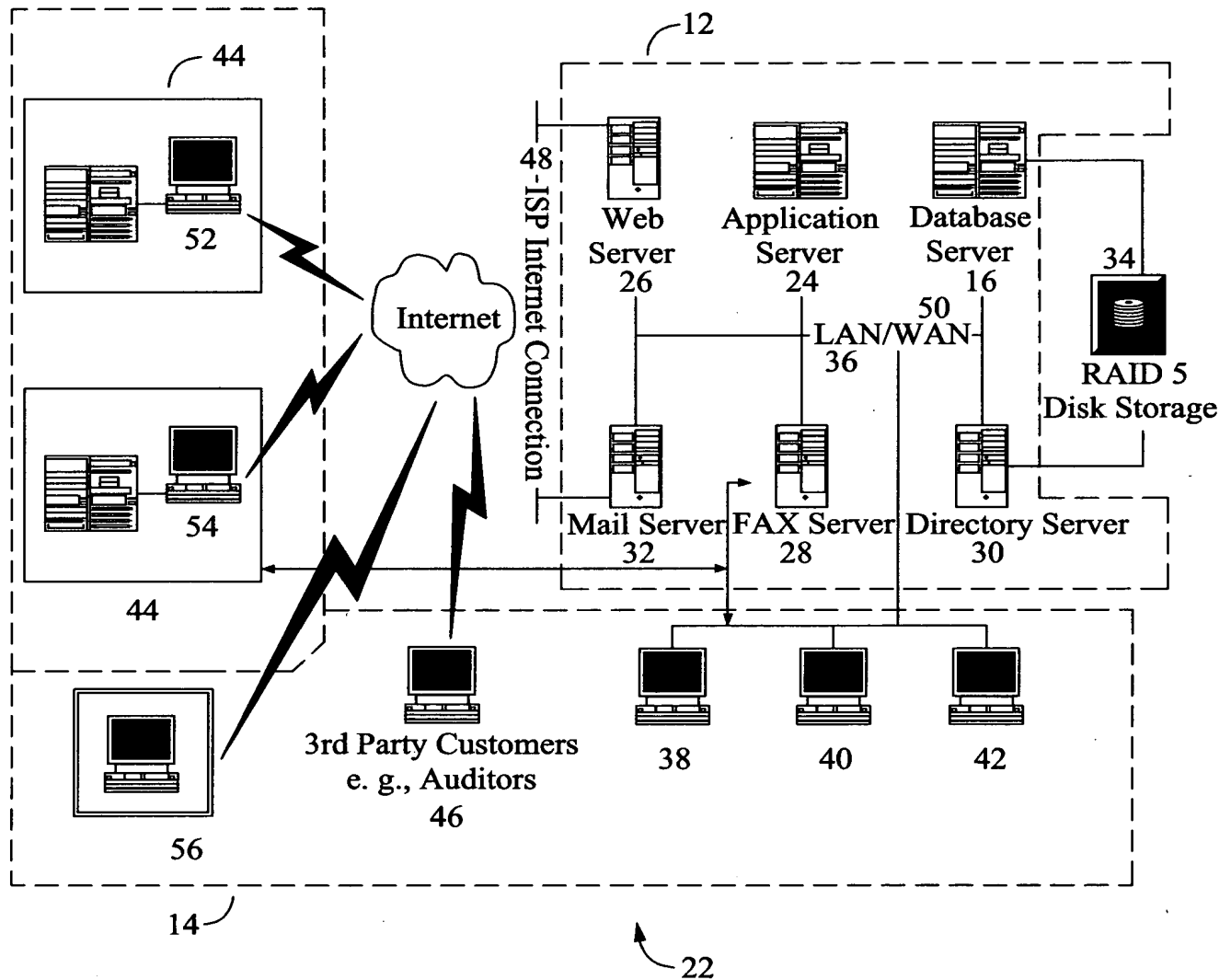


FIG. 2

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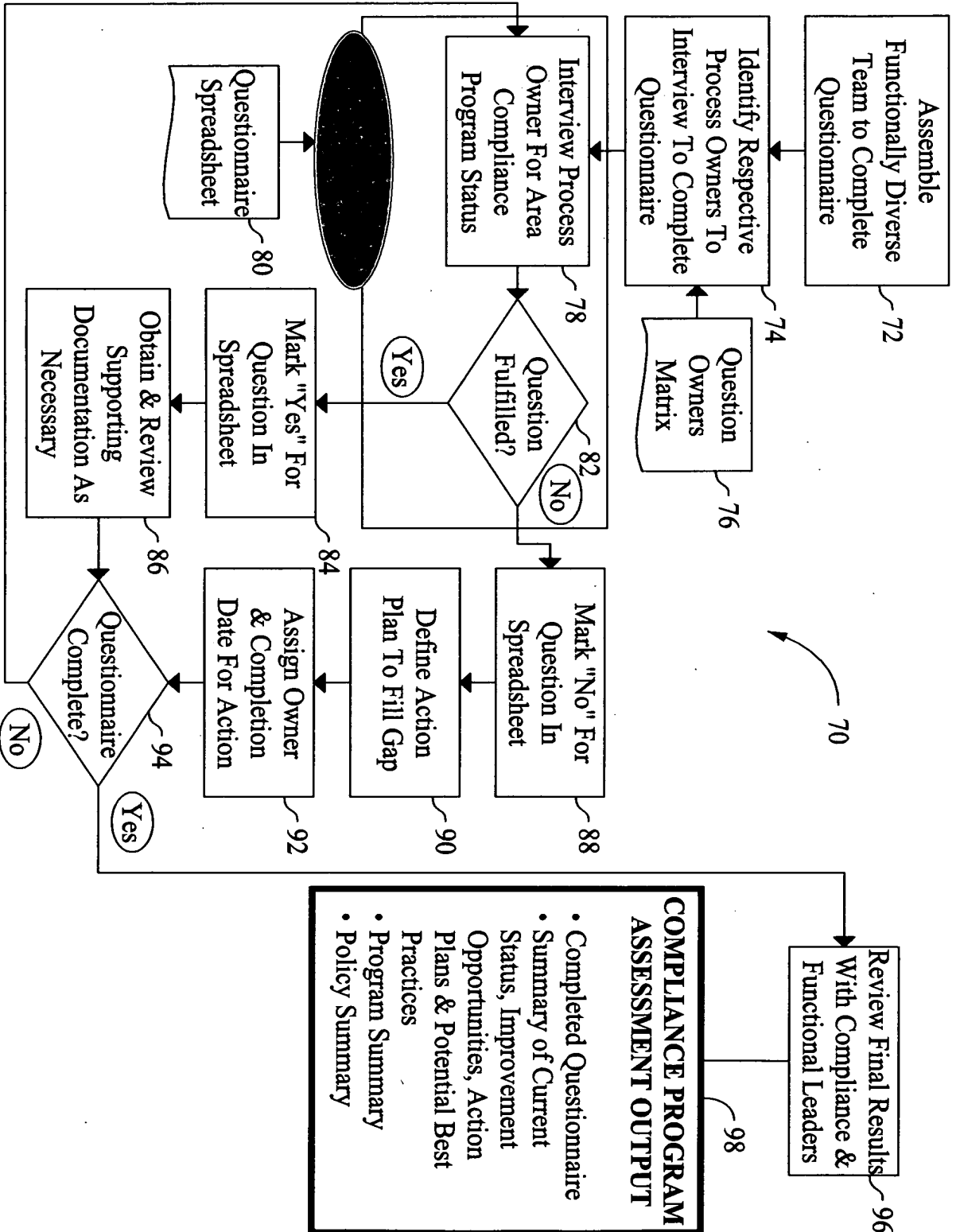


FIG. 3

102 4/27 100

<i>Compliance Assessment Areas</i>	Exec. Staff	HR
INFRASTRUCTURE		
I. Leadership Commitment & Operational Ownership	+	
II. Training		+
III. Communication & Management Reporting		
IV. Resources		
V. Discipline & Enforcement	+	
ISSUE IDENTIFICATION		
I. Identification		+
II. Roles & Responsibilities		+
III. Issue Identification		+
CTQ MEASUREMENTS		
I. CTQ Measurement Definition		+
II. Monitoring & Tracking		+
III. Audit/Verification		
20.2 EQUAL EMPLOYMENT OPPORTUNITIES		+
20.3 HEALTH, SAFETY, & ENVIRONMENTAL PROTECTION		
20.4 ETHICAL BUSINESS PRACTICES		
I. Due Diligence		
II. Routines & Controls		
III. Pricing & Discounting		
20.5 COMPLYING WITH ANTITRUST LAW		
I. Competitors		
II. Pricing		
III. M&A Business Arrangements		
IV. Services & Trade Associations		
20.9 FOLLOWING INTERNATIONAL TRADE CONTROLS		
I. Export Controls & Sanctions		
II. Boycott		
III. Import Compliance		
20.10 WORKING WITH GOVERNMENT AGENCIES		
I. Regulatory Compliance		
30.5 AVOIDING CONFLICTS OF INTEREST		+

FIG. 4A

FIG. 4B

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Legal	Finance	Mfg	Purchasing	Sales	Regulations	Mkg	Order Mgt	Engineering
				+				
+								
+								
+	+	+	+	+	+	+	+	+
+	+	+	+	+	+	+	+	+
+	+	+	+	+	+	+	+	+
+	+	+	+	+	+	+	+	+
+	+	+	+	+	+	+	+	+
+					+	+	+	+
		+	+		+			+
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+	+			+			+	
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+		+	+				+	
				+	+			+
+								

FIG. 4A

FIG. 4B

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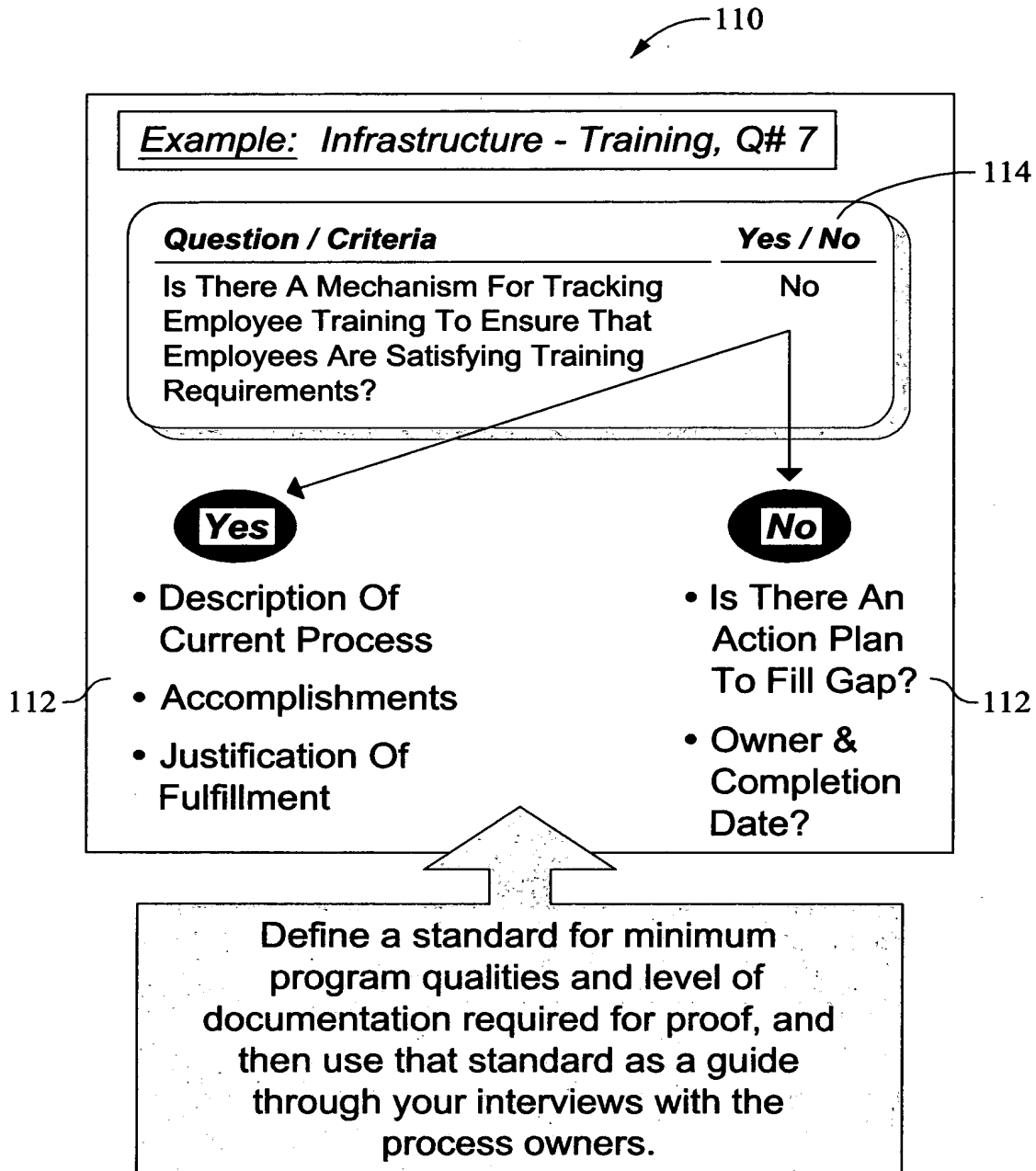


FIG. 5

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 Suite 2600, St. Louis, MO 63102 (314) 621-5070

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120

GE Widgets Compliance Program Assessment (CPA)					
<i>Business Location:</i>					
124					
INFRASTRUCTURE					
1. LEADERSHIP COMMITMENT & OPERATIONAL OWNERSHIP					
128					
	Y or N or NA	Current State	Tools/ Medium	Objective - Action Plan	Owner
1. Is compliance regularly on the agenda for senior leadership business reviews & meetings?	Y				
2. Are the business leader & his / her direct reports aware of the most important compliance risks and requirements in the business?	Y				
3. Is a compliance strategy communicated regularly across the Business by the Business leader & his / her direct reports?	Y				
4. Do functional leaders regularly discuss the compliance strategy & relevant compliance issues with their organizations?	N				
5. Is compliance included as part of the Appraisal and Incentive Compensation process?	N				
122					
126					

FIG. 6

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130

QUESTIONNAIRE METRICS				
COMPANY - LOCATION				
DATE				
124		136	134	132
		Score	Opps	% Met
INFRASTRUCTURE				
Leadership, Commitment & Operational Ownership		3	6	50.0%
Training		3	6	50.0%
Communication & Management Reporting		6	9	66.7%
Resources		2	4	50.0%
Discipline & Enforcement		1	1	100.0%
INFRASTRUCTURE		15	26	57.7%
ISSUE IDENTIFICATION		6	8	75.0%
CTQ MEASUREMENTS		2	3	66.7%
20.2 EQUAL EMPLOYMENT OPPORTUNITY		5	5	100.0%
20.3 HEALTH, SAFETY, & ENVIRONMENTAL PROTECTION		2	6	33.3%
20.4 ETHICAL BUSINESS PRACTICES				
Due Diligence		2	4	50.0%

Tabulated Results Spreadsheet - *Analysis*

FIG. 7

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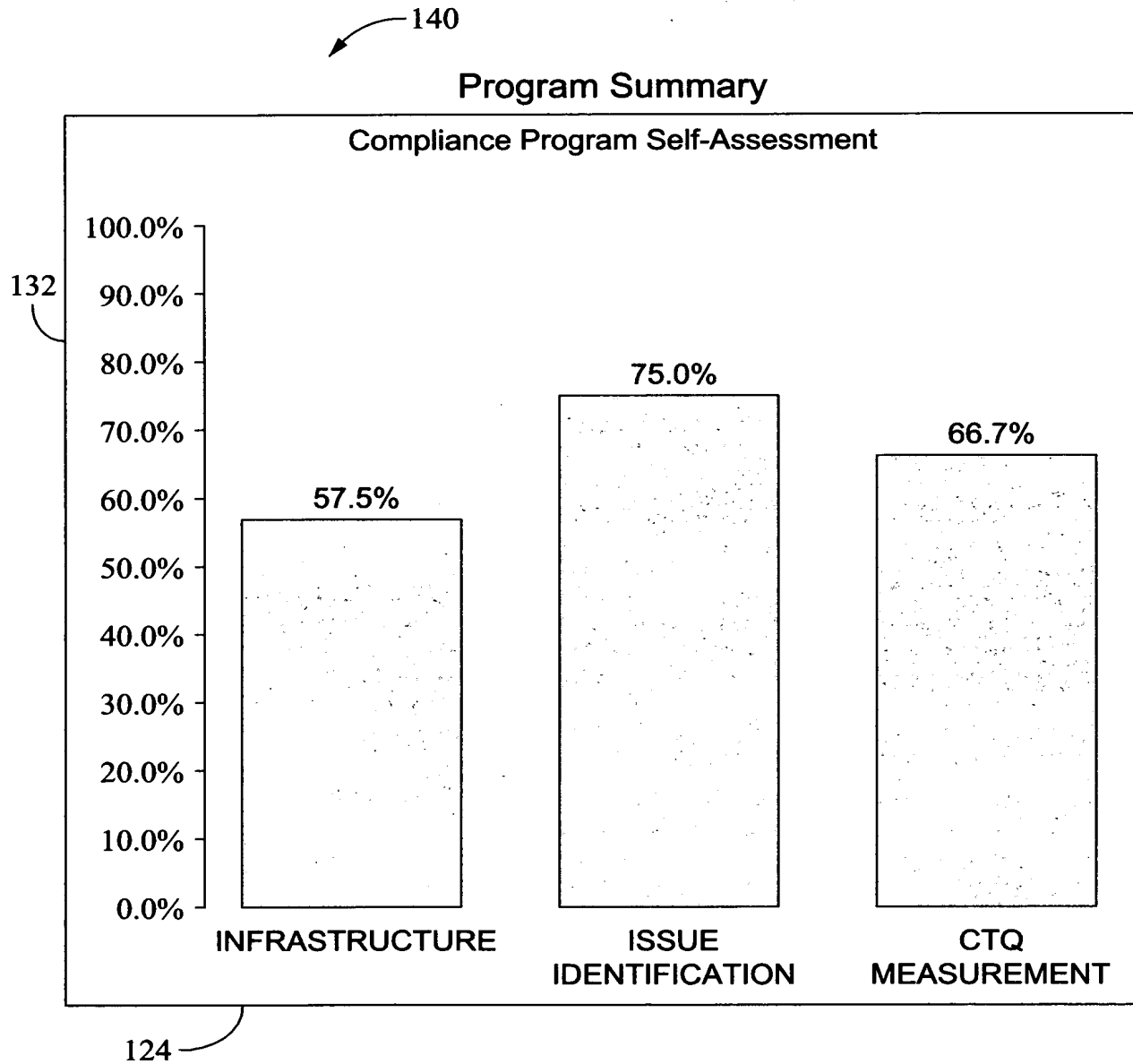


FIG. 8

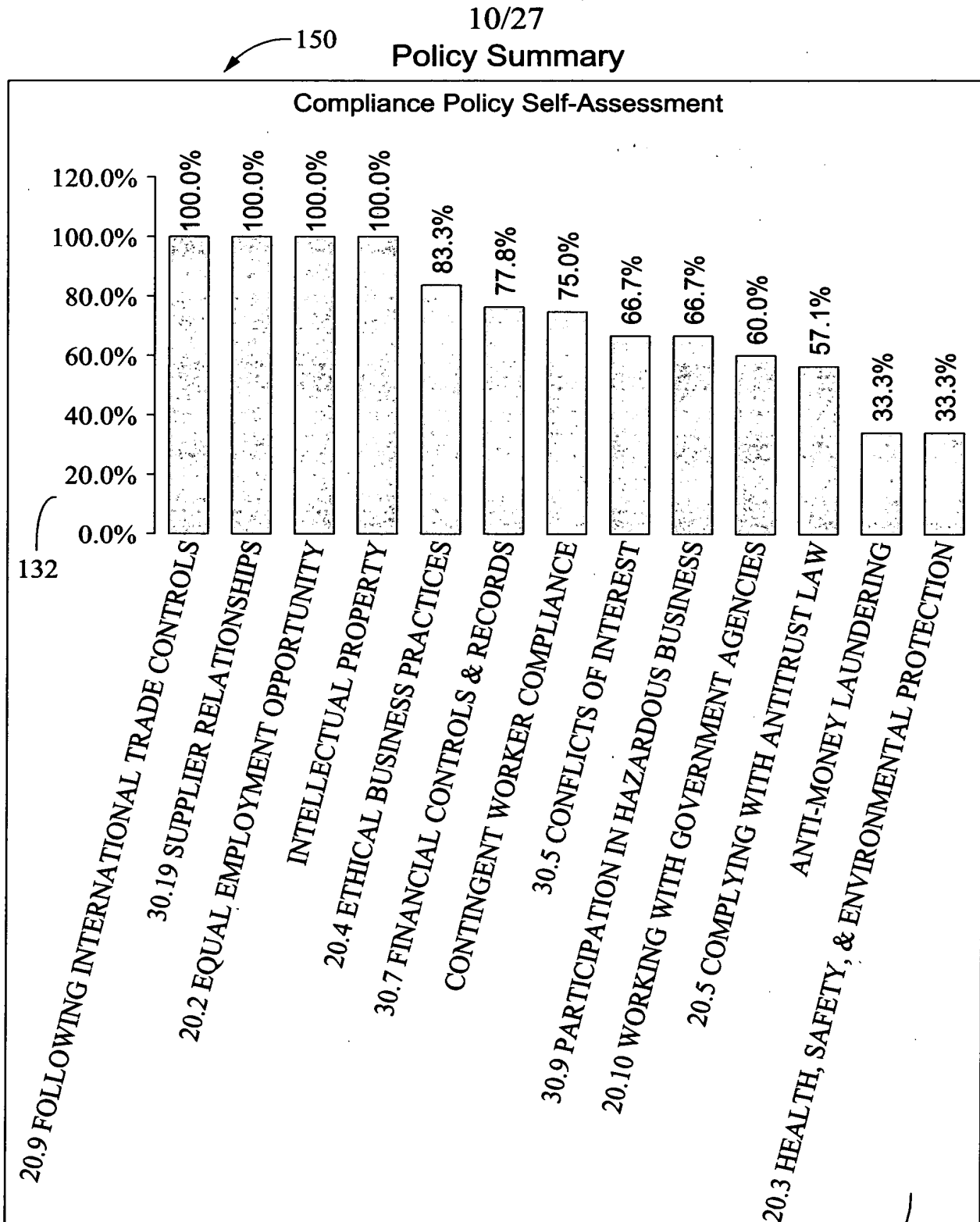


FIG. 9

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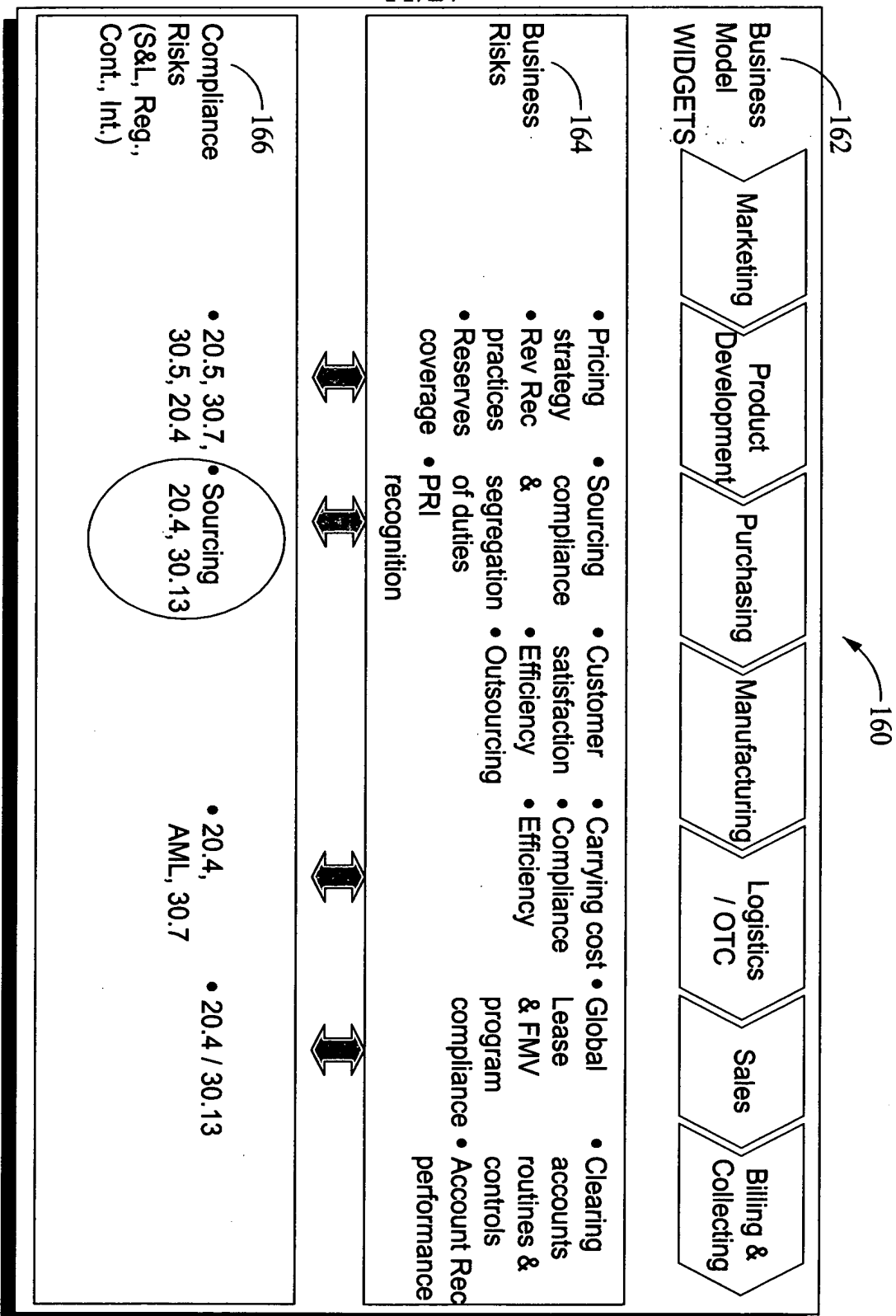


FIG. 10

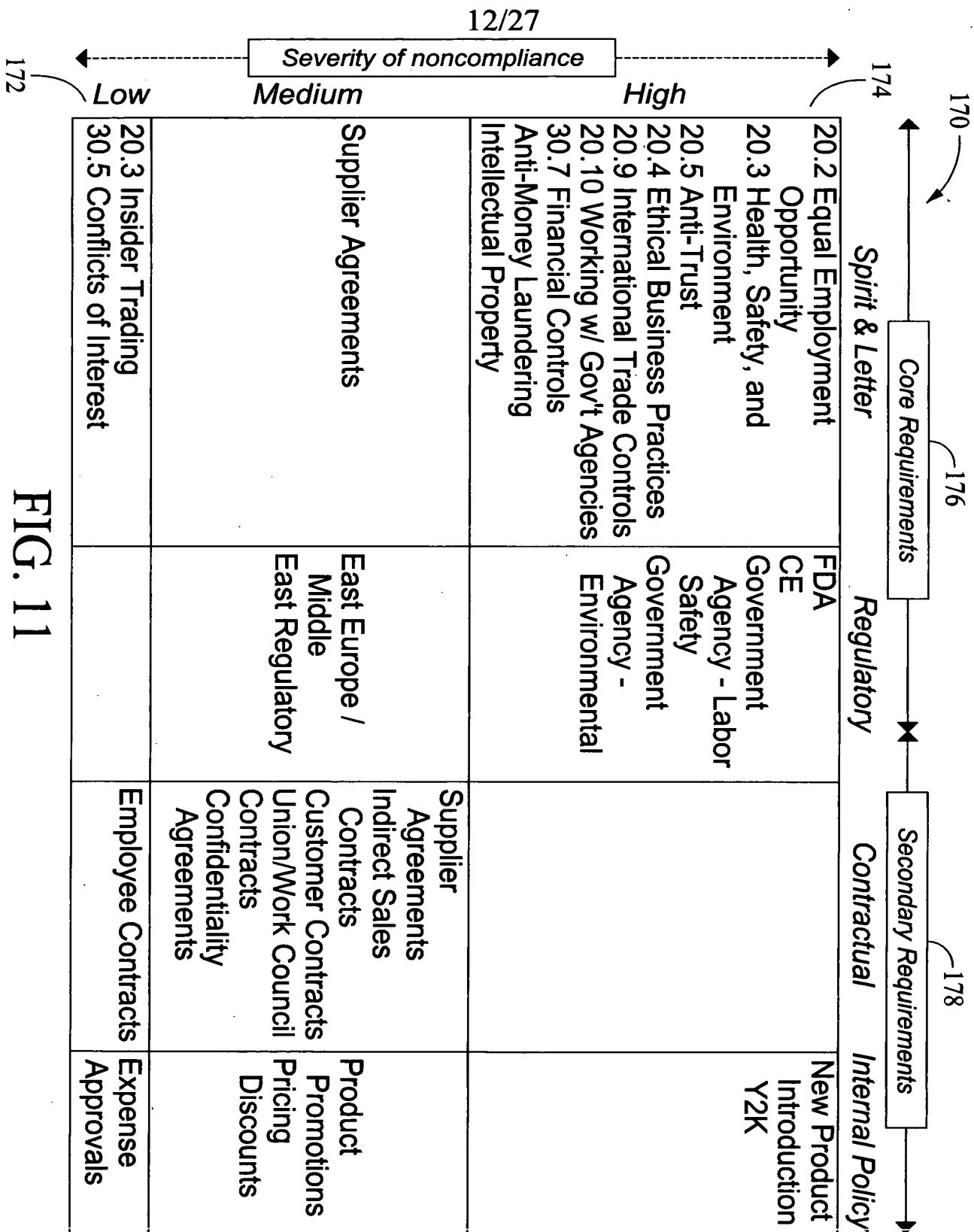


FIG. 11

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Enter Compliance Requirements

- List Used In Doing **Severity Matrix**

WIDGETS 182

Spirit & Letter

	20.2 Equal Employment Opp	20.3 Health, Safety & Environment	20.4 Ethical Business Practices	20.5 Antitrust	20.9 Int'l Trade Laws	20.10 Working With Government	20.13 Insider Trading	30.5 Conflicts Of Interest	30.7 Financial Controls	30.13 Supplier Relations	Anti-Money Laundering	Intellectual Property
<i>Severity</i>												
<i>Products</i>												
Physical												
Information Systems												
Services												
<i>Processes</i>												
Marketing												
Product Development												
Purchasing												
Manufacturing												
Logistics / OTC												
Sales												
1.1 Indirec												
1.1.1 Distributor												
1.1.2 Sales Agents												
1.2 Direct Sales Force												
Billing & Collecting												
<i>Environment</i>												
Acquisition												
Alliances												
System Implementation												
Restructuring												

FIG. 12A

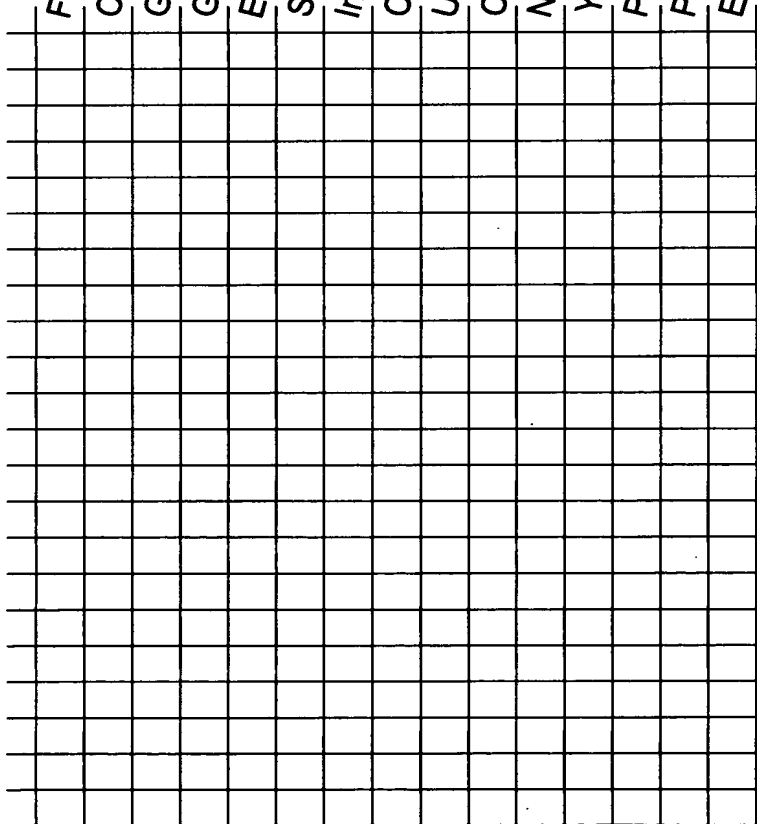
FIG. 12B

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Regulation
& Legislation

Contractual

Internal
Policies



FDA	CE	Government Agency-Labor & Safety	Government Agency-Environment	Eastern Europe/Mid East Regulatory	Supplier Agreements	Indirect Sales Contracts	Customer Contracts	Union/Work Council Contracts	Confidentiality Agreements	New Product Introduction	Y2K	Product Promotions	Pricing Discounts	Expense Approvals

180

FIG. 12A

FIG. 12B

190

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Spirit & Letter											

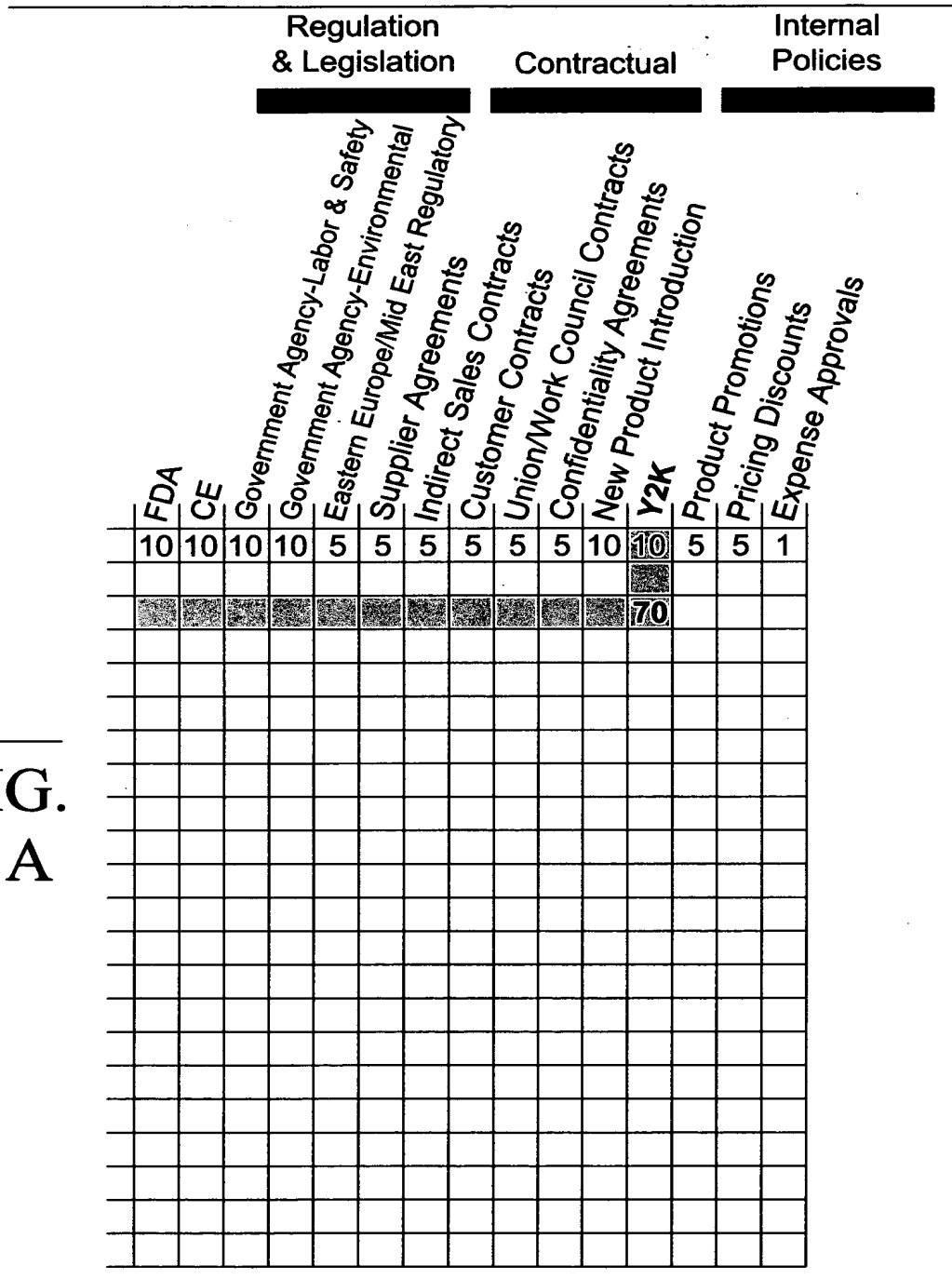


FIG. 13B

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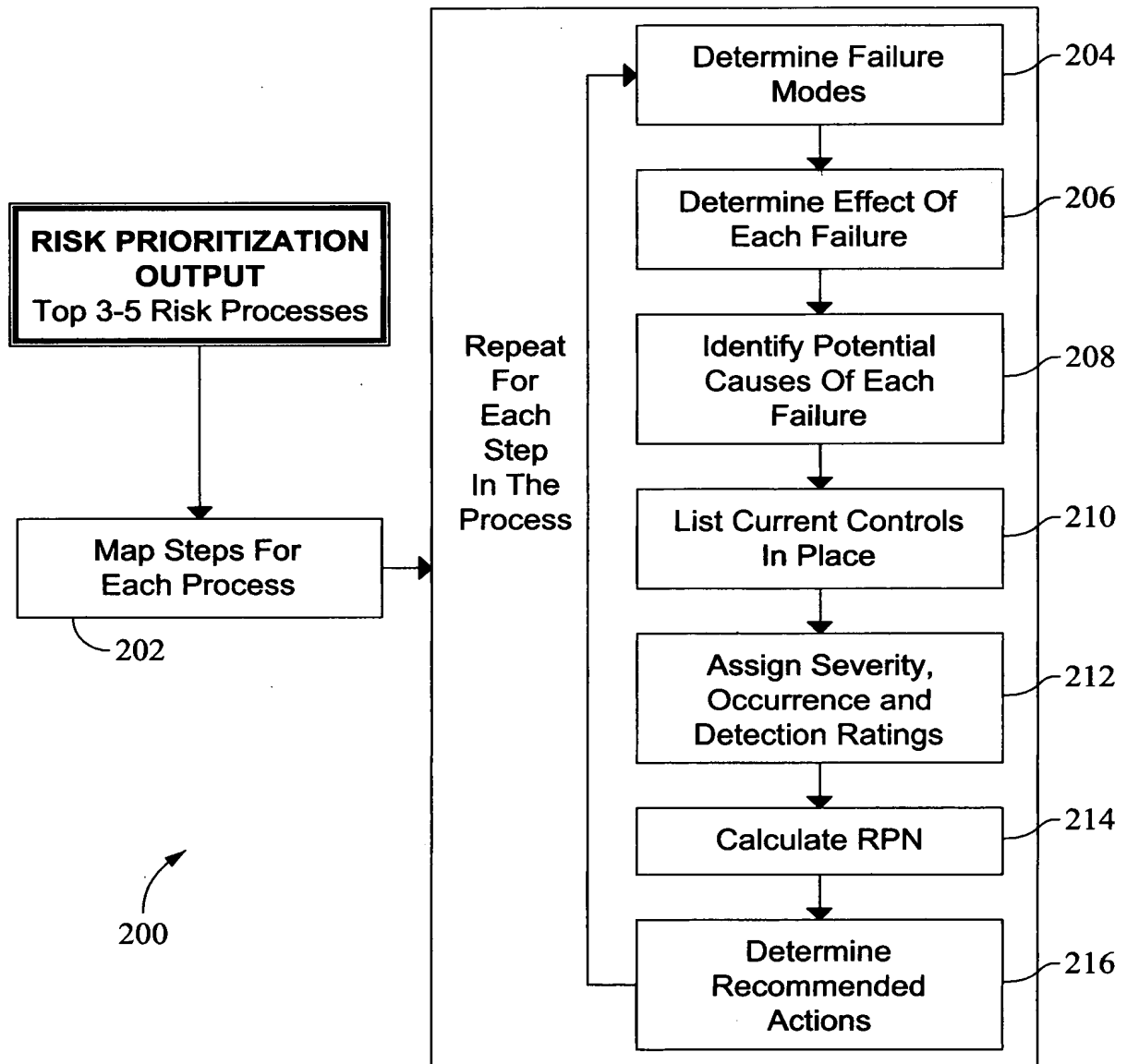


FIG. 14

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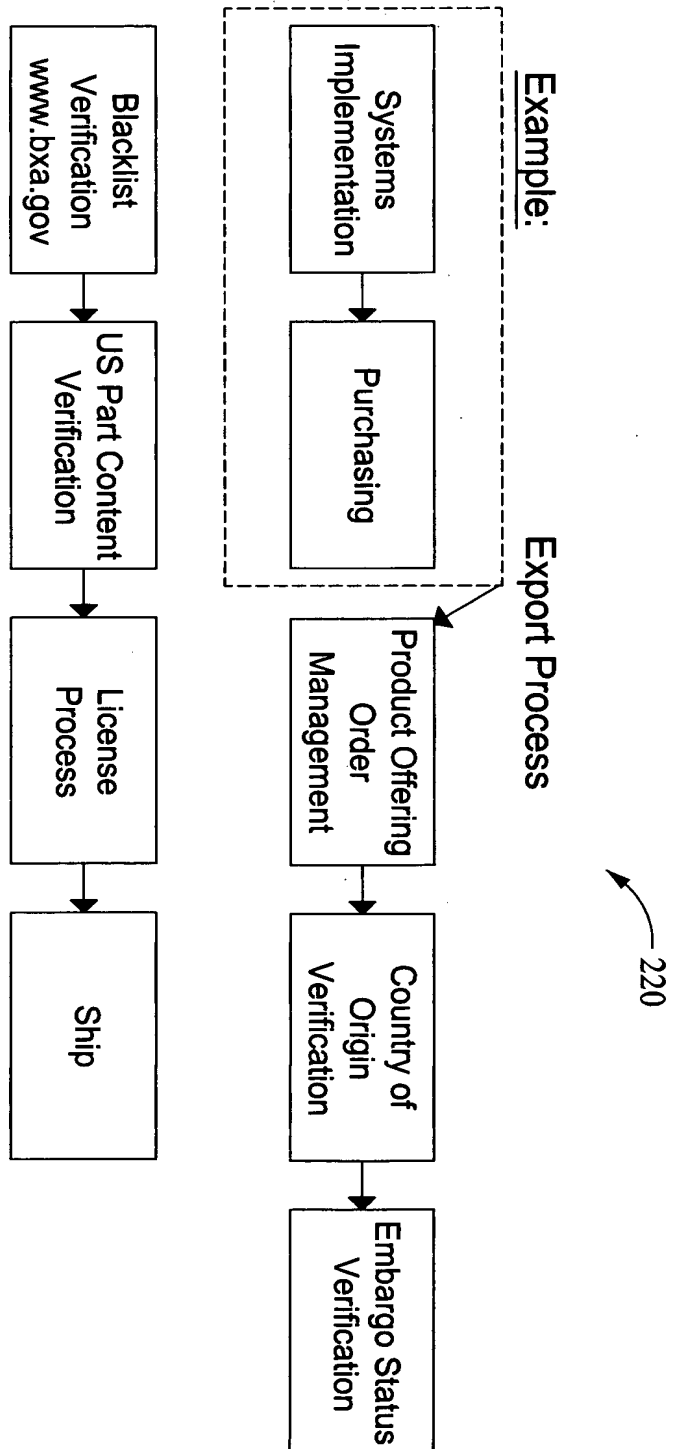


FIG. 15

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Process Step/Input	Potential Failure Mode	Potential Failure Effects	S V Potential Causes	O C Current Controls	D E T P R N	Actions Recommended	Resp.
Information Systems Implementation	Current Oracle Systems Programming does not deliver required info for 20.9	Inability to acquire Part Origin and US Content easily for the logistics process.	No Current Reporting Feasibility in Oracle	None. Manual data gathering available but tedious.	7 556	Validate similar risk with Marquette US. Submit an RTA to request the development and implementation of this oracle function.	A.H./R.N.
US Part Content Inspection	The calculation of the percent value of US Part to total order may not be accurate	More Goods than are allowed are shipped to sensitive customers	Inaccuracy in part 8 content verification process	Approved Internal Export Control Process (Seite 2 von 2) but manually executed	8 486	Submit and RTA to provide a report in Oracle that calculates the US part percentage automatically using the information in the product description, country of origin and cost	A.H./R.N.
License Verification	Accountability in Process Steps/Structure	Ship without licenses and potential loss of sales	Resource Allocations for this process is undefined	No process controls in place	7 10467	Identify Licensing Personnel	B.M./R.N.

FIG. 16

230

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270

FIG. 17C

Process Risk Assessment

Infrastructure

- 1 Has overall responsibility for Import/Customs compliance been assigned to specific high-level personnel? 1
- 2 Is there an Import/Customs focused compliance training held for: legal, sourcing, finance, and engineering? 1
- 3 Have implementation tollgates been established to address Customs compliance with new suppliers? 1
- 4 Does the import compliance process include monitoring of customs clearance agents to ensure that documents filed on behalf of GE are accurate and complete? 1
- 5 Does the business or CBSI have a single database of all customs entries for the business? 1
- 6 Is there an existing database (or equivalent) containing HTSUS classifications for all Is there at least one field in each of the following documents that can be found throughout: 1
- 7 Entry Package, PO or equivalent, Receiver, Commercial Invoice? 1

Routines & Controls

Are there Standard Procedures for:

- 8 Import specialists to manage the Import process? 1
- 9 Sourcing to use for Import compliance when creating a purchase order? 1
- 10 Brokers to use when creating entry summaries? 1
- 11 Valuation of non-transactional shipments (defective, samples, etc.)? 1
- 12 Recording, tracking and reporting assists? 1
- 13 Identifying additional payments made to suppliers? 1
- 14 Reviewing and issuing NAFTA certifications for eligible products? 1
- 15 Reviewing and evaluation any Special Programs in which the business participates? (GSP, 1

Total Score Out of 15 ==>

15

FIG. 17B

FIG. 17A

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FIG. 17A

270

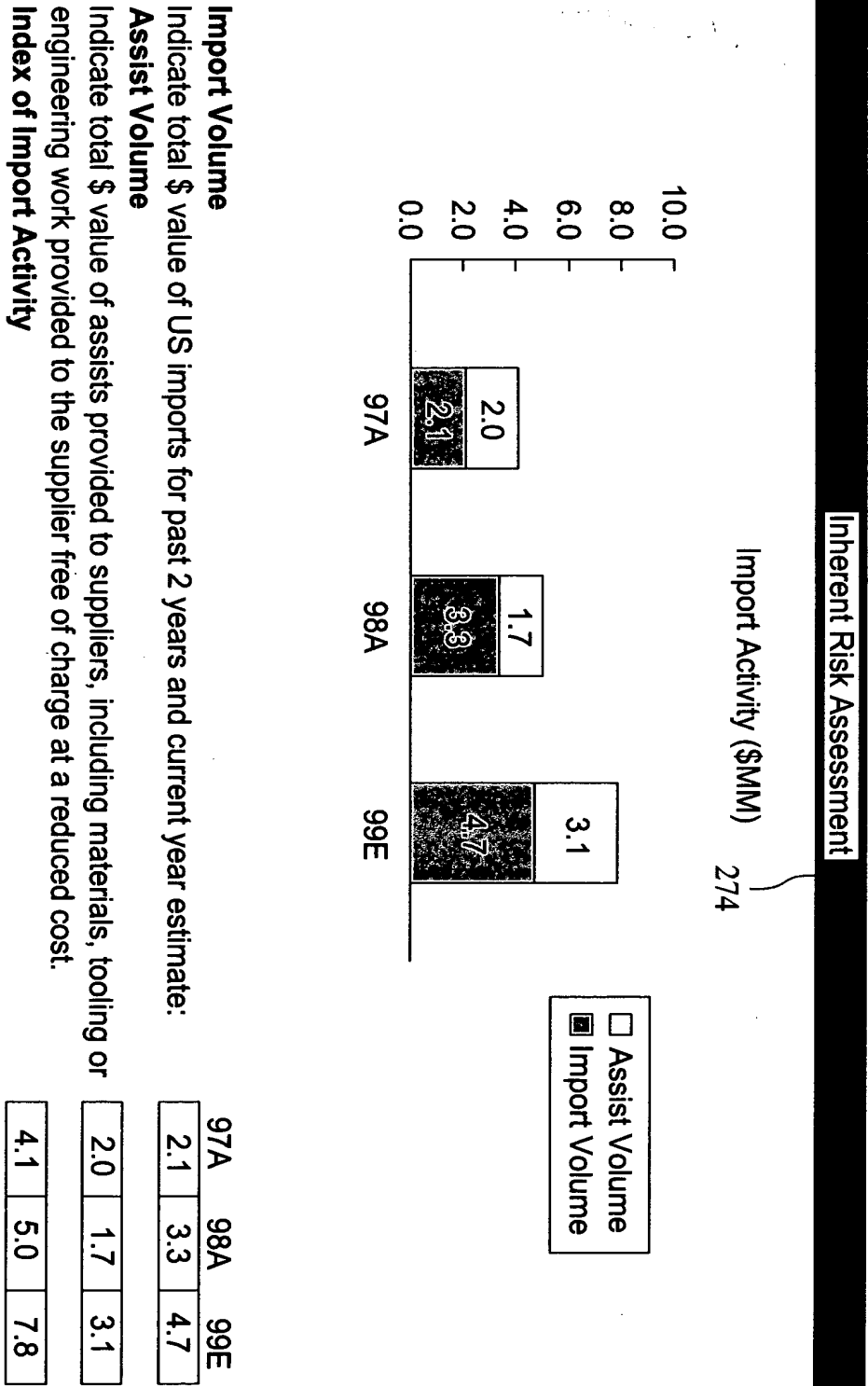


FIG. 17B

FIG. 17D

FIG. 17A

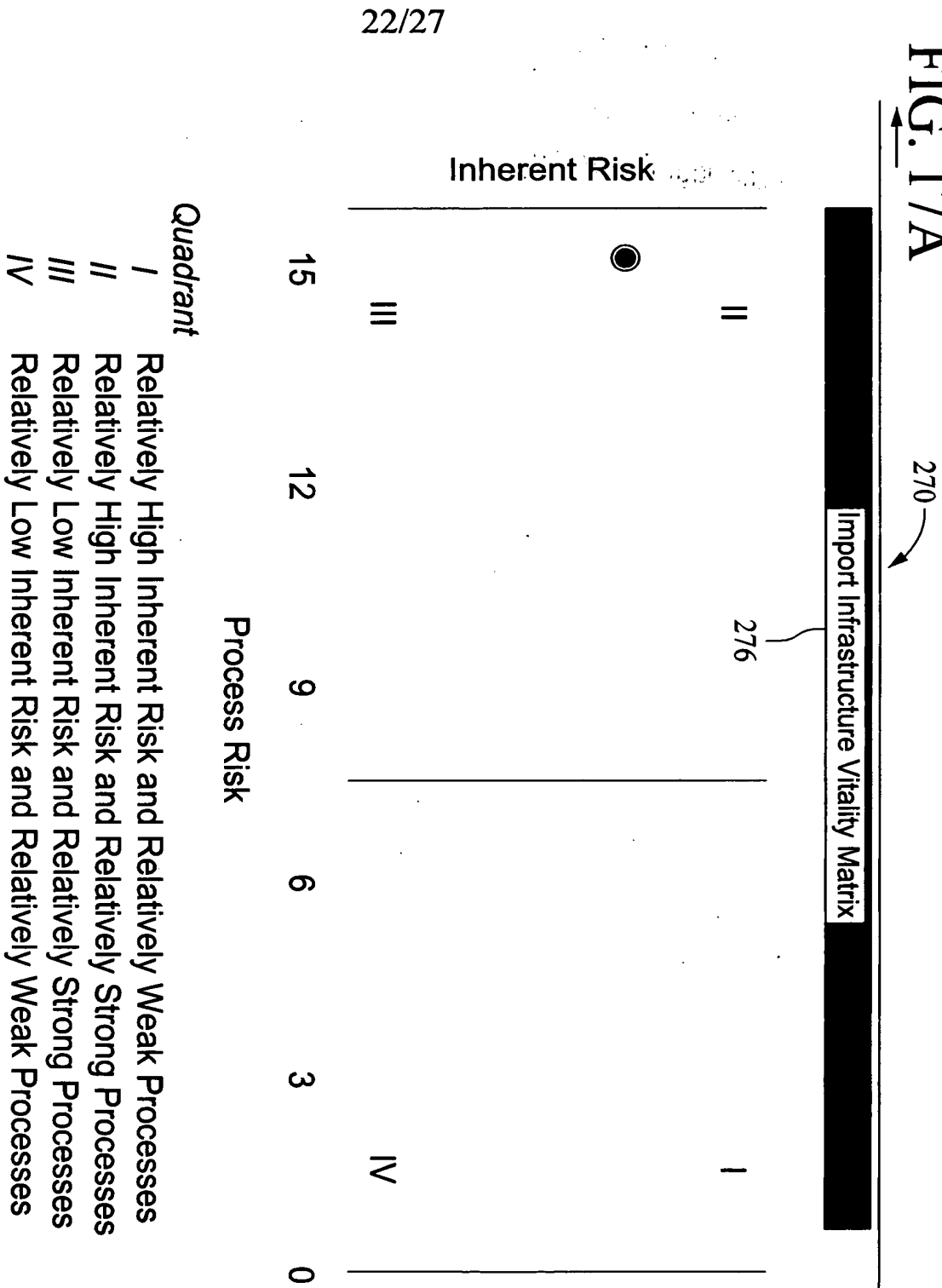


FIG. 17C

FIG. 17D

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FIG. 17C

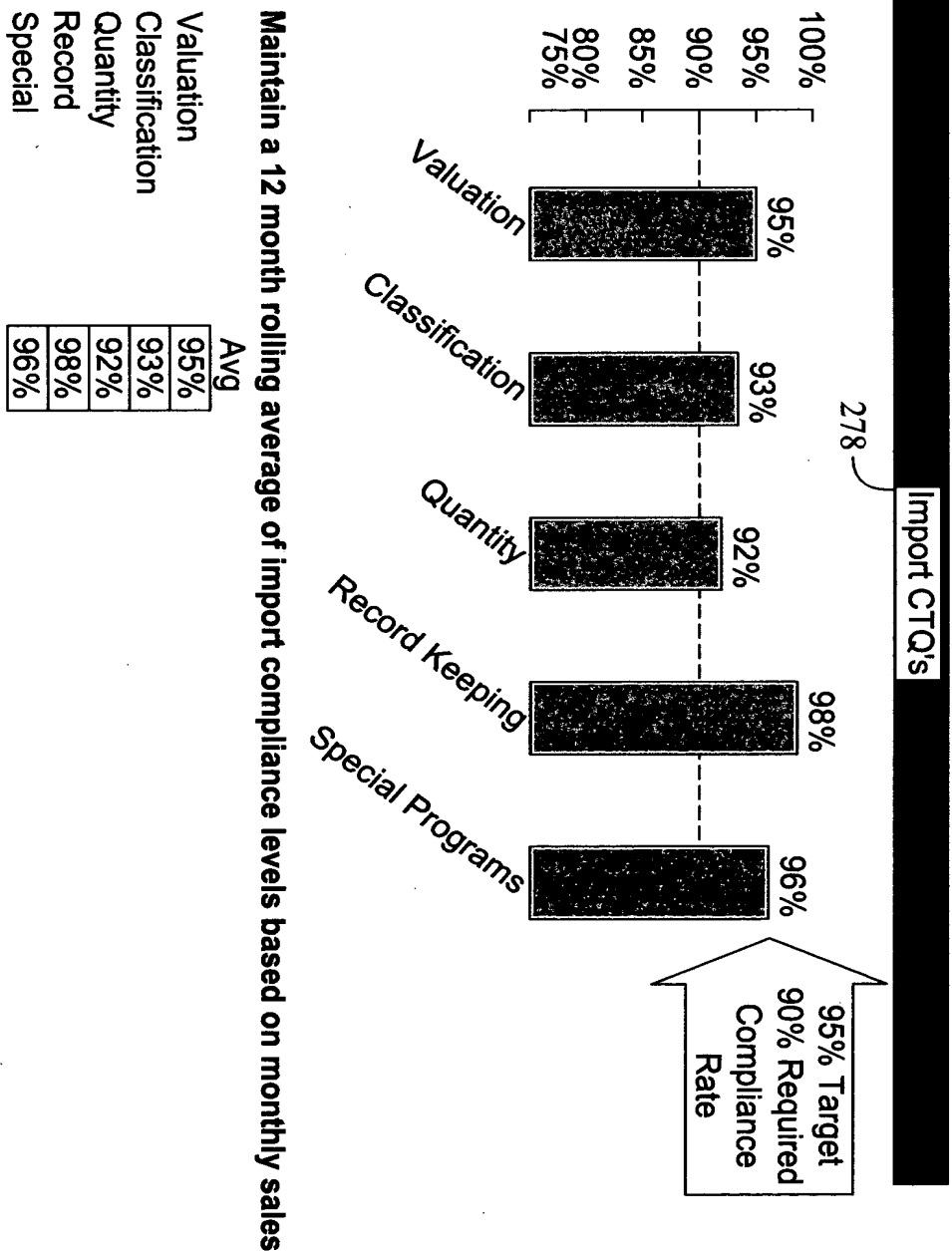


FIG. 17B

FIG. 17D

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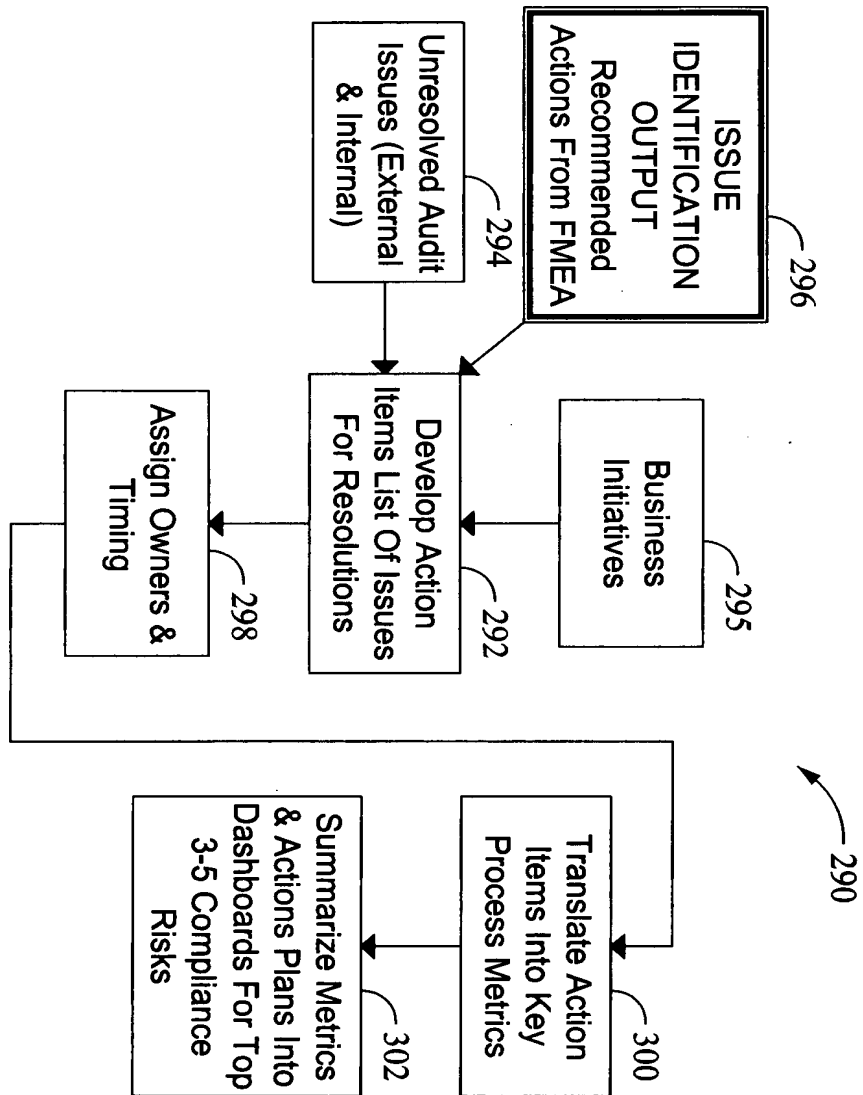


FIG. 18

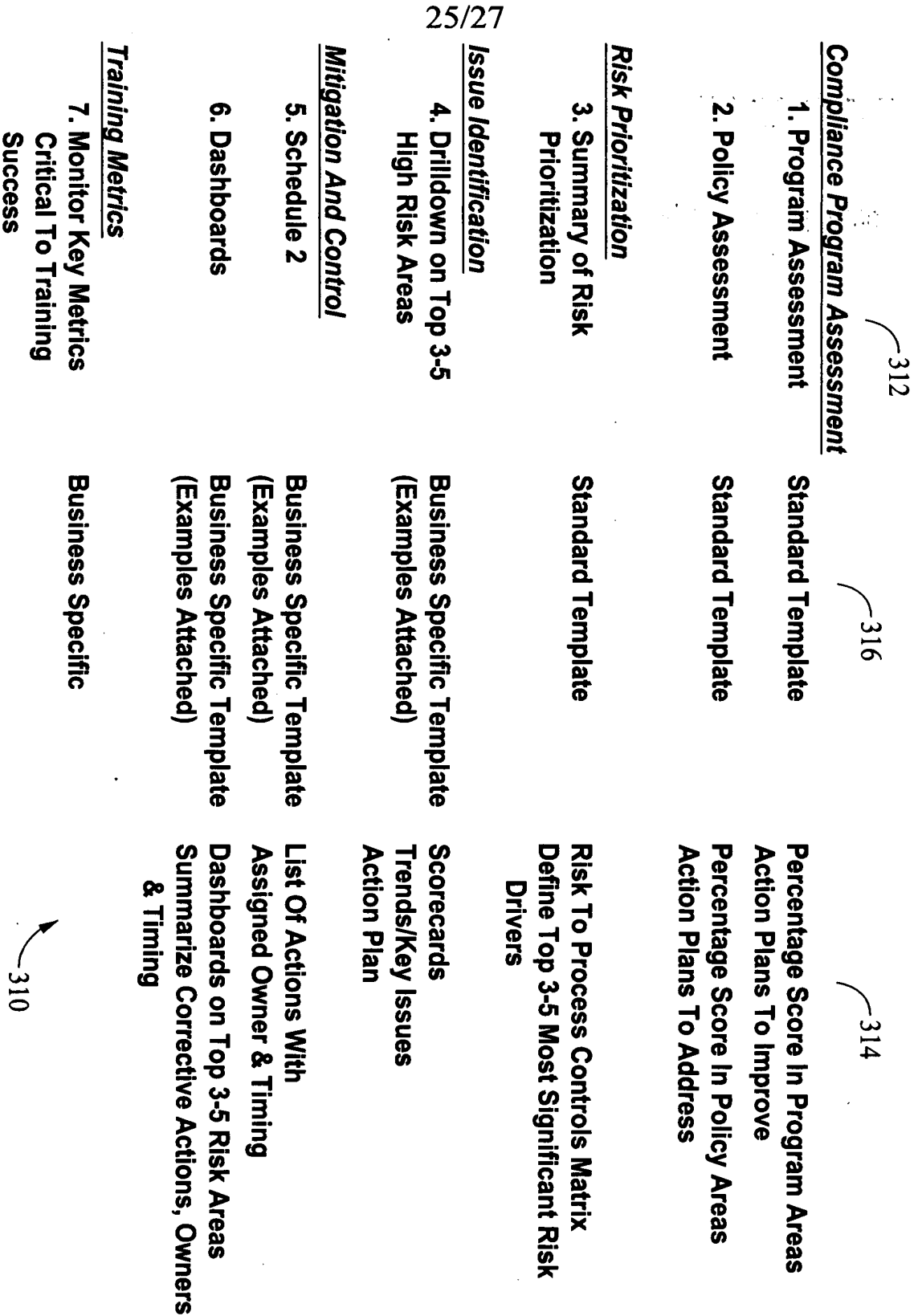


FIG. 19

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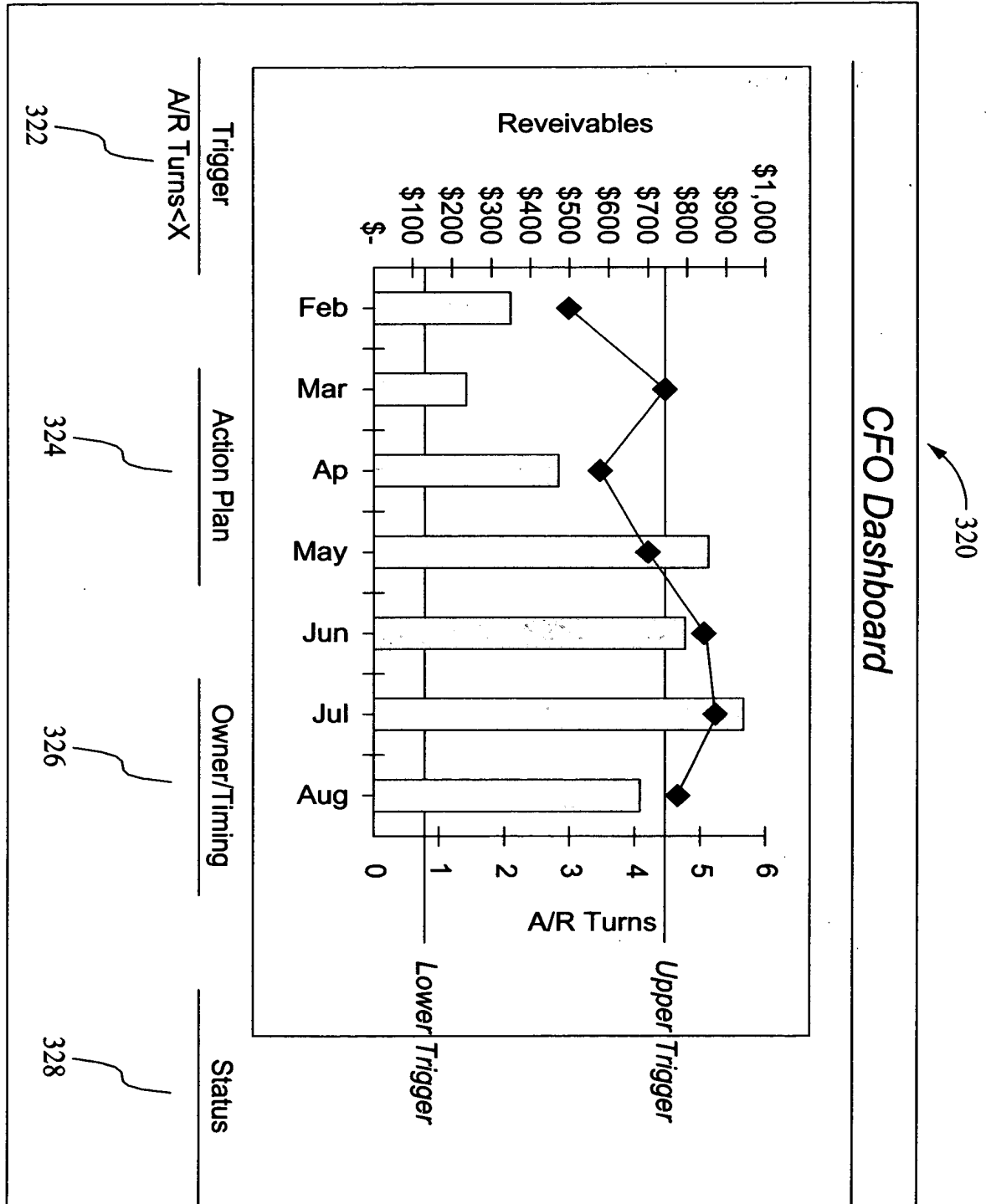


FIG. 20A

FIG. 20B

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FIG. 20A

FIG. 20B

